

Section 2. Revisions Since Publication of the Draft 2008 RTP PEIR

Since publication of the Draft 2008 RTP PEIR (Draft PEIR), the following refinements were made to the 2008 RTP Project Description:

1. The SCAG Transportation and Communications policy committee approved moving the following construction projects from the constrained project list in the RTP to the Strategic Plan:
 - Orangeline High Speed Rail (from Irvine to Palmdale)
 - CETAP Corridor B (EIR/EIS and Preliminary Engineering remain in the constrained plan.)
2. The SCAG Regional Council selected the Baseline Growth Forecast for the RTP, rather than the Policy Growth Forecast (see Master Response 1, Section 3 of this document for a discussion of the reasons for this change.)

The Orangeline project was included in the constrained project list for the Draft 2008 RTP (Draft RTP), but was not modeled in the Draft PEIR (see discussion page 1-4, Draft PEIR). The CETAP Corridor B construction project was similarly included in the constrained project list for the Draft 2008 RTP. However, on April 11, 2008, the SCAG Transportation and Communications policy committee approved moving both the Orangeline and CETAP Corridor B (except for the EIR/EIS and Preliminary Engineering portions) construction projects from the constrained 2008 RTP to the Strategic Plan.

Removal of the Orangeline and CETAP construction projects (individually and together) from the constrained RTP is within the error margin of the regional-scale modeling techniques and data presentation in the Draft RTP. The transportation projects included in the Draft RTP were analyzed on a system-wide level in the Draft PEIR, as part of the Proposed Plan (Draft 2008 RTP). As the PEIR is a programmatic document, the removal of two construction projects from the 2008 RTP does not change the analysis or conclusions presented in the Draft PEIR.

The only revisions to the modeled parameters results from the adoption of the Baseline Growth Forecast rather than the Policy Growth Forecast for the Final RTP. (For a discussion of the Growth Forecast(s) in the RTP, see Master Response 1, Section 3 of this Addendum.) Further, minor changes were made to the Baseline Growth Forecast to address comments received on the Draft RTP. These changes to the Baseline Growth Forecast do not affect any of the conclusions presented in the Draft PEIR.

The Draft RTP included both the Baseline and Policy growth forecasts. A discussion of the Baseline Growth Forecast was included in the Draft PEIR (see pp. 2-11 through 2-

14). The Draft PEIR analyzed the Baseline Growth Forecast as part of the No Project Alternative comparison of impacts in each section of the Draft PEIR and in the Alternatives chapter.

The No Project Alternative includes the same growth forecast (the Baseline Growth Forecast) as in the Final RTP. Modeling was performed for the Draft RTP using the Baseline Growth Forecast in the No Project Alternative, and the Draft PEIR analyzed associated environmental impacts. Revising the growth forecast from Policy to Baseline for the Final RTP does not result in any substantial impacts not previously analyzed in the Draft PEIR. Revising the growth forecast to Baseline results in project impacts associated with land use patterns similar to those impacts analyzed for the No Project Alternative described in each section of the Draft PEIR as well as in the Alternatives chapter. Modeled impacts (traffic, air quality, noise) for the refined Final RTP are within the range of impacts identified for the Draft RTP and alternatives analyzed in the Draft PEIR, and/or within the error margin of the models used for analysis.

These refinements to the 2008 RTP, and the resultant impacts on each issue area as compared to the project and alternative analyses presented in the Draft PEIR are discussed below. These refinements to the RTP do not result in the discovery of any new significant impacts, and all of the impacts discussed fall within the range of those impacts already analyzed in the Draft 2008 PEIR.

Thus, these revisions did not add any significant, new information to the Draft 2008 PEIR. The public was provided a meaningful opportunity to comment on the substantial adverse project impacts, feasible mitigation measures or alternatives that are not adopted, in accordance with CEQA Guidelines, 14 CCR Section 15088(a).

Final 2008 RTP

The Draft 2008 RTP was refined to reflect the following:

1. The SCAG Transportation and Communications policy committee approved moving the following construction projects from the constrained project list in the RTP to the Strategic Plan:
 - Orangeline High Speed Rail (from Irvine to Palmdale)
 - CETAP Corridor B (EIR/EIS and Preliminary Engineering remain in the constrained plan.)
2. The SCAG Regional Council selected the Baseline Growth Forecast for the RTP, rather than the Policy Growth Forecast (see Master Response 1, Section 3 of this document for a discussion of the reasons for this change.)

These refinements result in relatively minor changes to environmental impacts when compared to the discussions presented in the Draft PEIR for the Plan and No Project



Alternative. The following discussion presents a comparison of impacts under the refined Final 2008 RTP with impacts discussed in the Draft PEIR. As discussed above, these refinements to the RTP do not result in the discovery of any new significant impacts and all of the impacts discussed fall within the range of those impacts disclosed in the Draft PEIR. This comparison is presented as a clarification to information that was included in the Draft PEIR.

Aesthetics and Views

The Final RTP includes generally the same transportation network as the Draft RTP (with the exceptions noted above), and therefore would have similar impacts on aesthetics and views. In addition, the Final RTP now includes the same growth patterns analyzed in the No Project Alternative. As such, impacts would be similar to and within the range of impacts already analyzed in the 2008 Draft PEIR.

Again, the Final RTP includes the same transportation network as the Draft RTP (with the exceptions noted above). As a result, the impacts to scenic resource and vista points would be the same with the Final RTP as with the Draft RTP. Table 3.1-4 includes the list of projects planned on roadways eligible for state scenic highway designation and Table 3.1-5 shows project planned on roadways designated as state scenic highways. None of these projects would be changed as a result of the refinements to the RTP. Similarly, impacts resulting from construction and implementation of projects included in the 2008 RTP would be the same with the Final RTP as with the Draft RTP.

For cumulative impacts, the Final RTP would have less emphasis on infill development than the Draft RTP. The less compact development of the Final RTP would be similar to the development pattern discussed for the No Project Alternative, resulting in greater contrasts with the overall visual character of the existing landscape setting. However, these impacts would not be greater than those discussed for the No Project and would therefore be within the range of impacts already analyzed in the Draft PEIR.

Air Quality

Region-wide criteria pollutant emissions under the Final RTP would be between the criteria pollutant emissions for the Draft RTP and No Project Alternative. In general the Final RTP would result in emissions levels similar to the No Project Alternative, especially in Imperial County. The revisions reflected in the Final RTP would not change the conclusions presented in the Draft PEIR for the range of alternatives.

As with the Draft RTP, PM₁₀ emissions from heavy-duty trucks would be expected to decrease from 2008 levels for each county. As a result of the anticipated decline in TAC emissions, as with Draft RTP the Final RTP would have a less than significant impact with respect to regional TAC emissions.

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As with the Draft RTP, the Final RTP would be expected to generate a significant amount of construction activity and therefore exceed the significance thresholds established in the CEQA Guidelines. This would create a significant short-term impact. Other construction impacts include potential construction-related traffic impacts due to congestion from lane closures. These impacts would be addressed at the project level analysis.

Projected long-term emissions are considered to be cumulatively significant if they are not consistent with the local air quality management plans and state implementation plans. Total regional emissions under the Final RTP would be similar to those for the Draft RTP. The Final RTP conforms with the local Air Quality Management Plans. Emissions would also conform to the local Air Quality Management Plans and would have a less than significant cumulative impact with respect to consistency with applicable plans. As with the Draft RTP, the increase in emissions including greenhouse gas emissions in the region as a result of all sources would be significant (see pages 3.2-40 and 3.2-43 of the Draft PEIR.)

Note that the Final RTP Conformity Report reflects updates based on revisions made by CARB to the South Coast ozone and PM_{2.5} conformity emission budgets, in order to comply with federal transportation conformity requirements. Such updates do not present any significant, new information relevant to the air quality impacts analysis.

Biological Resources

Because the transportation network for the Final RTP would be similar to the network in the Draft RTP, the direct impacts of the Final RTP to biological resources would be similar to those of the Draft RTP. The impacts to natural vegetation, sensitive species and communities, habitat connectivity, near-road human disturbances, disturbances associated with construction generated smoke, light and noise; potential displacement of riparian and wetland areas, and siltation of water bodies would and construction impacts would also be similar. The area of special status habitat, vegetation, and wetland acreage impacted by the transportation network in the Final RTP would be similar to the amount impacted in Tables 3.3-5, 3.3-6, 3.3-7, and 3.3-8 (pages 3.3-38, 3.3-47, and 3.3-52, respectively in the Draft PEIR) of the Draft RTP due to the similarity of the transportation network in both the Draft and Final RTPs.

The Final RTP also assumes the less compact growth pattern of the No Project Alternative, therefore the Final RTP's cumulative impacts to biological resources due to urban development patterns would be the same as the cumulatively significant impacts of the No Project Alternative.

Cultural Resources

The Final RTP would have a similar transportation network as compared to the Draft RTP, therefore, direct impacts to cultural resources, including impacts to historical,

archaeological, and paleontological resources would be similar to those of the Draft RTP. The acreage of undisturbed areas that could be impacted by the Final RTP would be similar to that of the Draft RTP as shown in Table 3.4-9, page 3.4-28 of the Draft PEIR.

The Final RTP's cumulative impacts due to urban development patterns would be similar to the No project Alternative because the Final RTP assumes the less compact growth pattern of the No Project Alternative. The Final RTP would accommodate the same population, households, and employment as the Draft RTP, but does not assume the inclusion of the advisory land use strategies that would result in a substantial portion of future growth concentrated in existing urban centers through infill and redevelopment. The Final RTP allows for the growth of population and employment centers in the outlying areas of the region where consumption of open vacant land would occur. The Final RTP assumes the same pattern of growth as the No Project Alternative and would therefore have a greater potential for disturbing previously undiscovered cultural resources than the Draft RTP. Thus, the Final RTP's cumulative impacts would be similar to the No Project Alternative.

Energy

Impact 3.5-1, which relates to the use of non-renewable energy resources in construction and expansion of the regional transportation system, would be similar for both the Draft and Final RTPs as, both include similar transportation networks (see Draft PEIR pages 3.5-32 and 4-5).

Impact 3.5-2 relates to the use of non-renewable energy resources in the operation of the regional transportation system and operation of associated growth in the region between the current conditions and 2035. Energy usage would be similar to the No Project Alternative under the Final RTP (and greater than the Draft RTP) since growth patterns would be less compact than under the Policy Growth Forecast resulting in more greater expenditures of energy. Specifically, the Final RTP would consume approximately 34,110 thousand gallons of transportation fuel per day and the Draft RTP would consume approximately 32,940 thousand gallons per day due to an increase in VMT and VHT spent in delay. The Final RTP would consume slightly more electricity and natural gas than the Plan Alternative as a result of the less compact growth pattern. The magnitude of this impact would be similar as the impact under the Draft RTP analyzed in the Draft PEIR (see pages 3.5-33 through 3.5-34 and 4-5).

Impact 3.5-3 relates to the greenhouse gas reduction levels identified in AB 32 (1990 levels by 2020) and the California Climate Action Team Report. Transportation fuel use, the main contributor to greenhouse gas emissions in California, is expected to be slightly greater under the Final RTP when compared to the Draft RTP due to the less compact growth patterns that could be associated with the Baseline Growth forecast. As with the Draft RTP, the Final RTP would not meet the greenhouse gas reduction requirements

set forth in AB 32. However, these impacts would not be greater than those discussed for the No Project Alternative in the Draft PEIR and would therefore be within the range of impacts already analyzed in the Draft PEIR (see pages 3.5-41 through 3.5-45 and 4-5).

Cumulative Impact 3.5-4 is a significant impact relating to the overall growth in the use of non-renewable energy resources for the SCAG region. As mentioned above, transportation energy consumption under the Final RTP would be slightly greater than the Draft RTP. The analysis of residential energy consumption indicates that as with the No Project Alternative, the Final RTP would consume slightly more energy due to a land use distribution that includes less infill development and slightly less reliance on energy-efficient multi-family dwellings in inland areas versus the Draft RTP Policy Growth Forecast included in the Draft RTP. Overall, this impact would be slightly greater than the Draft RTP and similar to the No Project Alternative; as with the Draft RTP, the impacts of the Final RTP would be cumulatively considerable and therefore significant (see pages 3.5-45 through 3.5-46 and 4-5).

Geology, Soils, and Seismicity

Direct impacts to geological resources in the Final RTP would be similar to those of the Draft RTP. Impacts would remain significant because the transportation network would be similar in both the Draft and Final RTPs. The number of transportation projects in the Final RTP that could be potentially impacted by seismic and other geologic hazards would be similar to those shown in Table 3.6-3 of the Draft PEIR (pages 3.6-19 and 3.6-20), with the exception that the CETAP project would be removed. The removal of the CETAP project would reduce the number of projects by one out of a total of 40 and 43 projects in Orange and Riverside Counties, respectively. Within a regional context the removal of a single project would not represent a significant difference in the number of people that could be potentially impacted by geologic hazards. The Final RTP would result in patterns of development in geologically unstable areas similar to those discussed for the No Project Alternative. The same total number of people would be exposed to geologic hazards under the Draft RTP, Final RTP, and No Project Alternative. As with the No Project Alternative, the Final RTP would include a less centralized pattern of development and therefore would result in similar cumulatively considerable impacts on geological resources.

Hazardous Materials

The Final RTP does not assume land use strategies that encourage infill and redevelopment; therefore, transportation of hazardous materials could be similar to the No Project Alternative and could be slightly greater than the Draft Plan. Thus, Impact 3.7-1, which involves the routine transport, use, or disposal of hazardous materials and Impact 3.7-2, which relates to the risk of upset of hazardous materials, would be similar to the No Project Alternative and would be slightly greater under the Final RTP than the Draft RTP (see Draft PEIR pages 3.7-12 through 3.7-14).

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Impact 3.7-3 relates to the risk of release of hazardous materials within one-quarter mile of a school. Because the Final RTP would have the same transportation projects, with development similar to the No Project Alternative, this impact would be similar to the No Project Alternative (see Draft PEIR pages 3.7-14 through 3.7-15).

Both the Draft and Final RTPs include similar transportation projects. As a result, Impact 3.7-4, which relates to the risk of disturbing contaminated sites during construction, of transportation projects would be similar to the Draft RTP with the Final RTP. This impact would still be less-than-significant with mitigation (see Draft PEIR pages 3.7-15 through 3.7-16).

Cumulative Impact 3.7-5, which relates to hazardous materials transportation impacts on neighboring counties, would be similar to the Draft RTP, since mobility improves under the Final RTP, including that of heavy-duty trucks. This impact would still be significant (see Draft PEIR page 3.7-16).

Cumulative Impact 3.7-6, which relates to the risk of disturbing contaminated sites during construction related to the region's growth as a whole, would be expected to be less under the Final RTP since the Alternative would not encourage infill and redevelopment. The Final RTP would not assume development focused in urban areas and existing communities. As with the Draft RTP this impact would be less than significant with mitigation (see Draft PEIR page 3.7-16 through 3.7-17).

Land Use

The Final RTP assumes implementation of Compass Blueprint strategies in those areas that have already begun adopting compact land use, but not regionwide or at the intensities assumed with the Draft RTP. As with the No Project Alternative the Final RTP allows for further use of land for single-family development. Although the Final RTP assumes continuation of existing land uses in many cases, it is likely that General Plans will change to respond to changing development trends and environmental pressures. However, as stated in the PEIR p. 3.8-11, general plans are updated on an inconsistent basis. In addition, some of the general plans SCAG relied on in developing the 2008 RTP are out-of-date and may not reflect current planning practices. Further, the RTP's horizon year of 2035 is beyond the timeline of even the most recent general plans. Therefore, it is likely that over the period of the 2008 RTP, transportation projects and resulting growth will be inconsistent with currently adopted general plans, resulting in a significant impact.

Cumulative impacts associated with the Final RTP would be similar to those anticipated for the No Project Alternative (see Draft PEIR Table 3.8-1 page 3.8-15). The Final RTP growth distribution includes the same total population, but a less compact growth pattern (similar to the No Project). Without the land use strategies of the policy growth alternative, it is anticipated the Final RTP would consume about 655,000 acres of

vacant, open space and agricultural lands compared to approximately 200,000 acres under the Draft Plan. However, this would not result in any new, significant impacts because these impacts would not be greater than those discussed for the No Project Alternative in the Draft PEIR and would therefore be within the range of impacts already analyzed in the Draft PEIR

Noise

The Final RTP includes similar transportation investments as the Draft RTP. As a result, the Final RTP would have similar noise impacts as the Draft RTP. Impact 3.9-2, relating to the impact of noise-sensitive land uses directly adjacent to transportation facilities, would be similar to the Draft RTP and No Project Alternative under the Final RTP, since the Final RTP would have the same transportation projects as the Draft Plan and the same growth pattern as the No Project Alternative (see Draft PEIR pages 3.9-17 through 3.9-30).

Cumulative Impact 3.9-3 relates to ambient noise levels in urban areas. As with the No Project Alternative, the Final RTP would result in cumulative and ambient noise increases throughout the region. Cumulative impacts would be between those of the Draft Plan and the No Project Alternative (see Draft PEIR pages 3.9-30 – 3.9.31).

Open Space

The Final RTP's transportation network would have a similar potential effect on agricultural lands and open space as the Draft RTP. New development to accommodate the additional population could consume a similar number of acres as compared to the No Project Alternative. Under the Final RTP, which includes the Baseline Growth Forecast, approximately 655,000 acres would be urbanized compared to 200,000 under the Policy Growth Forecast assumed for the Draft RTP. Table 3.10-7 includes the amounts of agricultural, open space and vacant lands by county that would be expected to be consumed under the No Project Alternative, which includes the same growth forecast (Baseline Growth Forecast) as the Final RTP. This increase in the amount of urbanized acres would result in a greater cumulative effect than the Draft RTP on agriculture and open space, but within the range of impacts analyzed in the Draft PEIR. The Final RTP's contribution to cumulatively considerable impacts to vacant land would be similar to the No Project Alternative.

Population, Employment and Housing

The Final RTP would have the same number of households, employment and population as the Draft RTP. The impact of the induced population growth would be the same as the Plan, as both accommodate the same population increase. However, the Baseline Forecast includes a slightly different distribution of population, but the same distribution as the No Project Alternative. Table 3.11-12 on page 3.11-10 shows the population for both the Draft Plan (i.e., Policy Growth Forecast) and the No Project (i.e., Baseline Growth

Forecast). As discussed on page 3.11-10 of the Draft PEIR, the transportation investments would be expected to improve accessibility resulting in population and economic growth to areas to the region that are currently not developed. Although the distribution of population would be slightly different, impacts would still be expected to be significant at the regional scale.

The Final RTP would not assume development focused in urban areas and existing communities and as with the No Project Alternative would have less emphasis on infill development. As a result, the Final RTP may not result in as great an increase in the number of homes or businesses that are displaced, however, it is anticipated that impacts would remain significant, as with the No Project Alternative.

As with the No Project Alternative, cumulative impacts of increased urbanization would remain significant with the Final RTP that includes the Baseline Forecast (see page 3.11-13 for a discussion of cumulative impacts and impacts associated with the No Project Alternative). As discussed on page 3.11-13, increased accessibility due to transportation projects would contribute to a cumulatively considerable impact. This would occur with both the Policy Growth Forecast and the Baseline Forecast.

Public Services and Utilities

Under the Final RTP, the need for police and fire/emergency services and solid waste services would be similar to the No Project Alternative and slightly less than the Draft RTP because the Final RTP assumes the more dispersed growth pattern of the Baseline Growth Forecast (see pages 3.12-24 and 4-8 of the Draft PEIR). The potential to sever underground utility lines also would be similar to the No Project Alternative and less than the Draft RTP since population distribution would occur in less populated areas without existing underground utilities lines.

The cumulative impact of new development to accommodate the additional population, as stated on pages 3.12-24 through 3.12-25 and 4-8 of the Draft PEIR, would generate approximately the same need for additional emergency personnel, schools, and solid waste services for the Final RTP as for the No Project Alternative. The emergency vehicle response times resulting from the dispersed growth distribution of the Final RTP would be similar to the No Project Alternative (see pages 3.12-24 and 4-8). Greater extension of infrastructure would be needed for the Final RTP since new growth would be spread over about 655,000 acres of vacant, open space/recreational and agricultural lands compared to 200,000 under the Draft RTP (see page 3.12-25).

Security and Emergency Preparedness

Impact 3.13-2 discusses the potential of the RTP to inhibit the prevention, protection, response to, and recovery from major human-caused or natural events. Under all the alternatives, policies and procedures at the local, State and federal level are in place

regarding emergency procedures. These should not be impacted by any of the transportation plan alternatives (see Draft PEIR pages 3.13-16 through 3.13-18).

Impact 3.13-3 relates to exposure of people or structures to wildland fires. Similar to the No project Alternative, the Final RTP would result in greater risk for wildfire and/or mudslide destruction, compared to the Draft RTP. The Final RTP could result in up to approximately 655,000 additional urbanized acres, more than double that of the Draft Plan Policy Growth forecast. The Final RTP, thus, would have a greater cumulative effect than the Draft RTP, and have an impact similar to the No Project Alternative in inducing growth in areas with high threats of wild fires (See Draft PEIR pages 3.13-19 through 3.13-20).

Cumulative Impact 3.13-14 discusses how implementation of the proposed projects in the 2008 RTP can contribute to considerable fire threat due to an increase in mobility. Similar to the No Project Alternative, the Final RTP would have a less compact growth pattern. The Final RTP would not assume development focused in urban areas and existing communities. As a result, this impact would be less than significant with mitigation (See Draft PEIR page 3.13-20 through 3.13-22).

Transportation

The Final RTP would result in similar transportation impacts as compared to the Draft RTP. The Final RTP would result in similar daily VMT, compared to the No Project Alternative discussed in the draft PEIR; as under the Draft RTP and No Project Alternative the increase in VMT compared to today would be significant. Daily hours of delay under the Final RTP would be similar to those under the Draft RTP.

The Final RTP would result in a similar percentage of evening work opportunities within 45 minutes travel time as compared to the Draft RTP. See the 2008 Final RTP for work opportunities within 45 minutes.

In addition to changes in modeling results between the 2035 Draft RTP and Final RTP for Plan conditions, the 2035 No Project conditions also changed slightly as a result of refinements to SCAG's transportation model. (The Final RTP now includes a negligible increase in VMT of Plan compared to No Project conditions; accessibility numbers still show improvement.) All these changes in results are minor and well within the error margin of the model. Therefore the conclusions presented in the Draft EIR for traffic do not change for the Final RTP.

The effects of growth and other external factors are included in the Regional Travel Demand Model that produces the results reported above. Because these factors are modeled, the cumulative effects of regional growth are captured in the VMT, VHT, and heavy-duty truck VHT data reported for the Final RTP above. The Final RTP would have similar cumulative impacts as those of the Draft RTP.



Water Resources

The Final RTP includes a similar transportation network as the Draft RTP. Therefore, the direct impacts due to increased road runoff and drainage patterns would be similar to the draft RTP. Direct impacts to groundwater infiltration and increased flooding hazards, due to increased impervious surfaces of roads, would also be similar to the Draft RTP (direct impacts detailed in the Draft 2008 RTP PEIR 3.15, pages 36-45).

The Final RTP's cumulative water quality, groundwater recharge, and flood hazard impacts due to urban development patterns would be expected to be similar to those of the No Project Alternative (direct impacts detailed in the Draft 2008 RTP PEIR 3.15, pages 45-51). The Final RTP would accommodate similar growth in population, but as with the No Project Alternative the Final RTP does not assume land use strategies that encourage a substantial portion of future growth to concentrate in existing urban centers through infill and redevelopment. The Final RTP also includes the same number of jobs and households as the Draft RTP, but could consume more than twice as much land as the Draft RTP.

The cumulative impacts on wastewater service capacity, due to the growth expected between the base year and 2035, would regionally be approximately the same in the Final RTP as the No Project Alternative. The total population in each county would be the same under the No Project Alternative and the Final RTP. As identified in the Draft RTP PEIR, 4-10, four counties – Imperial, Los Angeles, Riverside, and San Bernardino – will remain at or above their wastewater treatment capacity in the Final RTP. Ventura and Orange counties are not expected to exceed their wastewater treatment capacity in the Final RTP. Though it is expected that services would be added as they are needed, for the purpose of determining significance of the impact, the future wastewater flow must be compared to the existing treatment capacity, and the impact of the Final RTP is significant.

Similar to the No Project Alternative (see Draft 2008 RTP PEIR, 4-10), in the Final RTP the *existing* water supply and infrastructure would not be able to support the population in 2035. Implementation of the mitigation measures associated with Impact 3.15-8 may provide future supply, but the *existing* supply still falls short of future demand; therefore the impact would remain significant.



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